

will undertake a search of these employees' archived emails and any collections of loose and/or hard copy documents to identify responsive, non-privileged documents

1. American Tower agrees to produce documents responsive to the following categories by April 4, 2014:
 - a. Using the ATC personnel who communicated with AT&T or AT&T's investment bankers, brokers, or other agents or intermediaries regarding the AT&T tower portfolio as custodians: All documents since American Tower's last harvest that are related to or about American Tower's communications with AT&T related to or about AT&T's MLA with TriStar.
 - b. Using the list of custodians in ¶ 5 below: All documents since American Tower's last harvest that are related to or about American Tower's communications related to or about the Maumee and/or Indian Creek sites.
2. TriStar agrees to produce documents responsive to the following categories by April 4, 2014. The collection of these documents shall be from any custodian previously collected by TriStar.
 - a. All documents since its last harvest related to or about AT&T's MLA with TriStar, including, but without limitation, AT&T's termination of its MLA with TriStar.
 - b. All documents since its last harvest related to or about TriStar's put/call options with Crown Castle International, including but without limitation, the exercise of same.
3. Due to the volume of documents produced by the parties to date, the number of document production requests served by the parties, and the anticipated time remaining until trial, all parties hereby agree that, subject to ¶ 4 below, the document production set forth above in ¶¶ 1 and 2 is the only supplementation of document production that will be required, absent good cause shown due to changed circumstances, and will be deemed as compliance with Fed. R. Civ. P. 26(e).
4. The supplemental document production set forth above in ¶¶ 1 and 2 does not preclude any party from voluntarily supplementing its document production in its sole discretion. To the extent either party chooses to voluntarily supplement its document production, the other party will be entitled to receive from the supplementing party production of additional documents necessary to ensure that neither party can produce only its own "good documents" regarding a subject matter while withholding its "bad documents."

5. American Tower custodians for ¶ 1.b above are:

Crosby, Greg	Moore, Jeoffrey
McNiel, Rob	Myers, Ben
Disanto, Ed	Noel, Bud
Dowling, Ruth	Noland, Stacey
Finnegan, Francis	Prescott, Chris
Flint, Harry	Rosa, Anthony
Grant, Marc	Rosenthal, Phillip
Hirsch, Jason	Smith, Rod
Maggio, Ed	Vondran, Steve
Marshall, Steven	Wu, Jacky

AGREED:

/s/ Matthew R. Stammel

William D. Sims, Jr.
Texas Bar No. 18429500
Matthew R. Stammel
Texas Bar No. 24010419
John D. Taurman
Texas Bar No. 19680400
Kyle D. Young
Texas Bar No. 24070899
Tyler J. Bexley
Texas Bar No. 24073923
VINSON & ELKINS L.L.P.
2001 Ross Avenue, Suite 3700
Dallas, TX 75201-2975
Telephone: 214.220.7700
Facsimile: 214.220.7716
bsims@velaw.com
mstammel@velaw.com
jtaurman@velaw.com
kyoung@velaw.com
tbexley@velaw.com

Harry M. Reasoner
Texas Bar No. 16642000
Stacey Neumann Vu
Texas Bar No. 24047047
VINSON & ELKINS L.L.P.
1001 Fannin Street, Suite 2500
Houston, TX 77002
Telephone: 713.758.2222
Facsimile: 713.758.2346
hreasoner@velaw.com
svu@velaw.com

*Counsel for Plaintiff and
Counter-Defendants*

/s/ Jon G. Shepherd

Jon G. Shepherd
Texas Bar No. 00788402
Courtney L. Gilbert
Texas Bar No. 24066026
ALSTON & BIRD, LLP
2828 N. Harwood Street, Suite 1800
Dallas, TX 75201
Telephone: 214.922.3400
Facsimile: 214.922.3899
jon.shepherd@alston.com
courtney.gilbert@alston.com

Michael L. Nepple
Missouri Bar No. 42082
THOMPSON COBURN, LLP
One US Bank Plaza
St. Louis, MO 63101
Telephone: 314.552.6149
Facsimile: 314.552.7000
mnepple@thompsoncoburn.com

David M. Rownd
Illinois Bar No. 6207951
THOMPSON COBURN, LLP
55 E. Monroe Street, 37th Floor
Chicago, IL 60603
Telephone: 312.580.2311
Facsimile: 312.580.2201
drownd@thompsoncoburn.com

Andrew P. Fishkin
New York State Bar No. 2234714
FISHKIN LUCKS, LLP
One Riverfront Plaza, Suite 220
Newark, NJ 07102
Telephone: (973) 536-2800
Facsimile: (973) 679-4435
afishkin@fishkinlucks.com

*Counsel for Defendants and
Counter-Plaintiffs*

CERTIFICATE OF SERVICE

On March 13, 2014, I electronically submitted the foregoing document with the Clerk of Court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all counsel and/or pro se parties of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Jon G. Shepherd

Jon G. Shepherd